

EXHIBIT 2

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From: [Kazim Nagvi](#)
To: [SKYRYSEMOOG.LWTEAM@lw.com](#)
Cc: [Rena Andoh](#); [Travis Anderson](#); [Lai Yip](#); [Michael Heins](#); [Tyler Baker](#); [scott.tenley@zfzlaw.com](#); [Ben.Heller@zfzlaw.com](#); [catherine.thompson@halpernmay.com](#); [alyssa.titche@halpernmay.com](#); [Rachel.Fiset@zfzlaw.com](#); [grant.gelberg@halpernmay.com](#)
Subject: Moog/Skryse - Reid Raithel Laptop Image
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Counsel:

The Court's order on Moog's Motion to Enforce and for Sanctions provides in relevant part: "The Court orders Skryse to produce complete forensic images of Ms. Bird and Mr. Raithel's Skryse-issued laptops to iDS within 30 days of this Order, after conducting a privilege review." (Dkt. 564).

As you know, the materials produced by Skryse to iDS in response to this portion of the order became available for review on Thursday night. Our experts have now completed an initial assessment and we do not believe Skryse is in compliance with its obligations.

While it appears that Skryse did produce a complete forensic image of a Mac computer with Lori Bird's user data to which limited privilege redactions were applied, it appears that Skryse did not produce a complete forensic image of Mr. Raithel's Skryse-issued laptop. Instead, Skryse produced only a limited data collection from a Mac computer for Reid Raithel. Specifically, it appears that on April 8, 2022, shortly after this lawsuit was filed, there was a limited collection of files from Mr. Raithel's Skryse computer, called "DCCollection_2022_04_08_16-38-42.L01," and this is what was produced to iDS instead of a complete forensic image. We note that beyond the completeness issues, the date of the collection is also independently concerning since it does not capture all of Mr. Raithel's activity on his computer during his tenure at Skryse in possession of Moog nonpublic information.

The collection of Mr. Raithel's files is highly incomplete – among other things, it is missing relevant files from the following folders:

/private/var/root/Library/Application Support/com.apple.sharedfilelist
/Users/[username]/Library/Application
Support/com.apple.sharedfilelist/com.apple.LSSharedFileList.ApplicationRecentDocuments

These folders are highly relevant because they include files maintained by the operating system that track a person's recent file and folder activity.

The L01 is also missing:

1. The FSEvents folder (.fsevents), which contains information about file activity tracked by the operating system; including deleted files.
2. The Spotlight V-100 folder, which contains an index of file activity.

Notably, Ms. Bird's laptop image contains all of these critical pieces of information.

Given the serious nature of this issue in response to the Court's sanctions order, we request that Skryse confirm by end of the day that it will produce a complete and current forensic image of Mr.

Raithel's Skyrise laptop to iDS by the end of the week. If we do not receive such confirmation, or an adequate explanation of what was indeed produced, we intend to raise this issue with the Court immediately. All rights are expressly reserved.

Thank you,
Kazim

Kazim A. Naqvi

+1 424-288-5336 | direct

KNaqvi@sheppardmullin.com | [Bio](#)

SheppardMullin

1901 Avenue of the Stars, Suite 1600

Los Angeles, CA 90067-6017

+1 310-228-3700 | main

www.sheppardmullin.com | [LinkedIn](#) | [Twitter](#)